

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLANDFILED  
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ENTERED  
RECEIVEDMaurice Bernard Stewart, Jr.

MAR 04 2019

AT LAW  
CLERK U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

BY

DEPUTY

#208-348

14100 McMullen Hwy. S.W.Cumberland, Maryland 21502\*

(Full name, date of birth, identification #, address of petitioner)

Plaintiff,

Case No.: GLR-19-679  
(Leave blank. To be filled in by Court.)

v.

Corizon Health Company, \*Holly Pierce, Nurse Practitioner14100 McMullen Hwy. S.W.Cumberland, Maryland 21502

(Full name and address of respondent)

Defendant(s).

COMPLAINT

## I. Previous Lawsuits

A. Have you filed other cases in state or federal court dealing with the same facts as in this case or against the same defendants?

YES

☐

NO

☒

B. If you answered YES, describe that case(s) in the spaces below.

1. Parties to the other case(s):

Plaintiff:

N/A

Defendant(s):

N/A

2. Court (if a federal court name the district; if a state court name the city or county):

N/A

3. Case No.: N/A
4. Date filed: N/A
5. Name of judge that handled the case: N/A
6. Disposition (won, dismissed, still pending, on appeal): N/A
7. Date of Disposition: N/A

## II. Administrative Proceedings

A. If you are a prisoner, did you file a grievance as required by the prison's administrative remedy procedures?

YES ☒ NO ☐

1. If you answered YES:

a. What was the result?

My complaint was found to be meritorious when I filed an administrative remedy complaint to the Warden.

b. Did you appeal?

YES ☐ NO ☒

2. If you answered NO to either of the questions above, explain why: once you have a meritorious finding to your complaint inmates do not have to file anything else concerning the matter.

## III. Statement of Claim

(Briefly state the facts of your case. Include dates, times, and places. Describe what each defendant did or how he/she is involved. If you are making a number of related claims, number and explain each claim in a separate paragraph.)

I have been suffering from severe chronic pain in my groin (testicles) area, severe pain in my left side of my jaw, severe headaches and severe pain in my left ear, all due to a dislocated jaw due to an old injury.

## IV. Relief

(State briefly what you want the Court to do for you.)

I am requesting For the Court to order Corizon Health Medical Company to address to issue of the Pain in my groin (send me to A urologist (Specialist) and i am requesting For the Court to award me \$200,000.00 in punitive and compensatory damages From Corizon Health Company and \$100,000.00 in punitive and Compensatory damages From Holly Pierce N.P. For my Pain and Suffering.

SIGNED THIS 28<sup>th</sup> day of February, 2019.

Maurice B. Stewart, Jr.

Signature of Plaintiff

Maurice B. Stewart, Jr.

Printed Name

14100 McMullen Hwy, S.W., Cumberland, Md. 21502

Address

N/A

Telephone Number

N/A

Email Address

Continuation of Statement  
of Claim

FILED  
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AT LEX 1000  
CLERK U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
BY

I had been submitting numerous sick-call slips trying to be seen by the medical staff to treat me for the severe pain in my groin area to no avail. I do not know the cause of the groin pain. I also have been trying to see a provider for chronic care visit and treatment so I could also get some treatment for my dislocated jaw and the medical staff refused to answer my sick-call slip or see me for chronic care visit.

I Was seen by the dentist in 2018 who then Made sure that a provider did an initial consultation to send Me to the University of Maryland Medical Center in Baltimore City to be seen and evaluated by the oral surgeon who then recommended For an M.R.I. and also a Ct. scan too, i was seen by that oral surgeon on November 8<sup>th</sup> 2018. After being in excruciating Pain For a whole Month Later and being ignored by the prison's Medical Staff, i Filed an administrative Remedy Complaint to the Warden on December 3<sup>rd</sup> 2018 who Found My

Complaint Meritorious on January 7<sup>th</sup> 2019, he stated that on 11/8/18 i was evaluated by an oral surgeon with a recommendation FOR a CT scan and a M.R.I. scan, but there was no record of an oral surgeon follow up consult, nor a consult for the CT scan or the M.R.I. scan either. The Warden stated that "a provider has been notified to schedule me an appointment to address the issue. However my pain and my serious Medical condition was still ignored deliberately by Holly Pierce, N.P. and the Corizon Health Medical Company.

I then Filed another administrative Remedy to the Warden, claiming that i was supposed to be seen by a provider every 3 months For chronic Care visits and i still had not been seen yet at the time that i had Filed my complaint on January 16<sup>th</sup> 2019 and once again the Warden Found my complaint Meritorious, stating that although Patients are supposed to be seen For chronic Care every three Months, Medical records indicate that i was seen For Chronic Care on August 20<sup>th</sup> 2018 and not seen For Chronic Care again until until February 4<sup>th</sup> 2019.

So i was deliberately ignored by the  
Corizon Medical Staff For 3 entire  
Months. This was not an accident or  
Mistake because i Filed numerous sick-  
call slips Letting them know that i  
was in pain with my groin, that i was  
in pain with my Jaw and ear, that i  
need to get the oral surgeon's recommended  
consults done so i could get the Ct scan,  
the M.R.I. scan and the consult<sup>to</sup> Follow up  
my Visit with the Oral surgeon and that i  
still needed to be seen For Chronic Care and  
i was still ignored by the Medical staff



For Months before i was Finally  
seen by Medical on February 4th 2019  
and then at some time during Mid to  
Late February the consults was done  
by Ms. Holly Pierce, N.P. but only after  
the Long unnecessary delay.

And to this day the Medical Staff  
still has not address the Chronic and  
debilitating pain in my groin yet.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

Maurice B. Stewart, Jr.

February 8<sup>th</sup> 1967

#208-348

14100 McMullen Hwy., S.W.

Cumberland, Md. 21502

(Full name, date of birth, identification #, address of petitioner)

**Plaintiff,**

Case No.: GLR-19-679

(Leave blank. To be filled in by Court.)

v.  
Corizon Health Medical Company,  
Holly Pierce, N.P.

14100 McMullen Hwy., S.W.

Cumberland, Maryland 21502

(Full name and address of defendant)

**Defendant(s).**

**CERTIFICATE OF SERVICE**

I hereby certify that on February 28<sup>th</sup> 2019,  
a copy of The Foregoing 1983 Civil Lawsuit  
was mailed via first class mail, postage prepaid, to Ms. Felicia C. Cannon, Clerk,  
U.S. District Court, Baltimore 101 W. Lombard Street, Baltimore, Maryland  
21201

Maurice B. Stewart, Jr.  
Signature of Plaintiff

Maurice B. Stewart, Jr.  
Printed Name

14100 McMullen Hwy., S.W., Cumberland, Md. 21502  
Address

N/A  
Telephone Number

N/A  
Email Address